

III. REMARKS

1. Claims 1 and 20 are amended. Claims 13 and 36 are cancelled without prejudice.
2. Claims 1-9, 11-14, 16, 17, 20-27 and 29-37 are not unpatentable over Haestrup in view of Lisle under 35 USC §103(a).

It is submitted that there is no motivation to combine Haestrup with Lisle to achieve Applicant's claimed subject matter as is required for obviousness under 35 U.S.C. §103(a). In order to establish a *prima facie* case of obviousness under 35 U.S.C. §103(a), there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the references or combine reference teachings. There must also be a reasonable expectation of success, and the reference(s), when combined, must teach or suggest all of the claim limitations. (See M.P.E.P. §2142).

Haestrup is directed to a predictive text input engine utilizing a dictionary that is keyed by a string of keystrokes. Lisle is directed to a text compression method where a hierarchy of dictionaries are used to compress and decompress a text. (Col. 4, lines 43-48.) The dictionaries are sorted based on the frequency of use a text. The sorting is not only dependent upon the language but also upon a specific sort of text (financial, legal etc.). The keys used in Lisle depend upon which dictionary the sought after word is to be found in and how deep within the dictionary it is to be found. In this respect, the system of Lisle is very similar to an ordinary Huffman coding scheme.

The system of Lisle is not compatible with Haestrup and a combination of these references would not be obvious in order to achieve Applicant's claimed subject matter. Applicant's claimed subject matter is directed to reducing the size of messages to be sent or texts to be saved. Whole words are coded as references to the dictionary rather than coding the characters that make up the word.

Haestrup is a communication terminal with a predictive text editor. The program matches entered keystrokes with completed words from a linguistic database. Haestrup describes how to save both the keystroke and the matching word. Lisle is a text compression method that utilizes a heirarchy of dictionaries where the dictionaries have their entries arranged by a weighted frequency of use for the words encountered. The two systems are disparate and the combination is not easily realized or even attainable.

One will not be motivated to take a system such as Lisle having a dictionary system based on a frequency of use and combine it with a system that generates text based on keystroke inputs to achieve a system where words are coded with references to a dictionary, where the references are strings of keystrokes through which the predictive editor program can retrieve the words to be used from said language dependent dictionary. Therefore, motivation, as required for purposes of 35 USC §103(a) is not established.

Additionally, the references are not analogous art, and may not be combined for purposes of 35 U.S.C. §103(a). A reference is analogous art if the reference is in the same field of endeavor as the applicant's, or the reference is reasonably pertinent to the particular problem with which the applicant was concerned. Haestrup is directed to a predictive text editor that generates an output containing words matching a string of key strokes. Lisle is a text compression program that uses look up dictionaries where the entries in the dictionaries are arranged by a weighted frequency of use of the words that are encountered (Col 3, lines 34-39). Applicant's claimed subject matter is directed to coding whole words with references to the dictionary, where the references are strings of keystrokes through which the predictive editor program can retrieve the words to be used from said language dependent dictionary. Thus, the references are not analogous and cannot be combined for purposes of 35 USC §103(a).

Furthermore, the proposed combination of Haestrup and Lisle does not disclose or suggest each feature recited by Applicant in the claims. Claim 1 recites that a program is capable of compressing text data by replacing words with "references" to a language dependent dictionary, or decompressing text data by retrieving words from the language dependent dictionary, where the "references" are strings of keystrokes through which the predictive editor program can retrieve the words to be used from the language dependent dictionary. This is not disclosed by the combination of Haestrup and Lisle. Haestrup only discloses that vocabulary look-up processing is handled by a computer program on the market today. (Col. 4, lines 25-26). The basic dictionaries are compressed in order to reduce memory requirements. (Col. 4, lines 32-34.) There is no disclosure here or elsewhere in Haestrup related to "references" being strings of keystrokes through which the predictive editor program can retrieve the words to be used from the language dependent dictionary as is claimed by Applicant. Combining Haestrup with Lisle does not overcome at least this deficiency.

Lisle teaches that the entries for the dictionaries are arranged by a "weighted frequency of use for the words encountered." (Col. 3, lines 34-39). This is not the same or similar to replacing words with "references" to a language dependent dictionary and decompressing text data by retrieving words from the language dependent dictionary, where the references are strings of keystrokes through which the predictive editor program can retrieve the words to be used from the language dependent dictionary. Since at least this feature is not disclosed or suggested by either Haestrup or Lisle, their combination cannot disclose it as well. Thus, each element of claim 1 is not disclosed or suggested by the combination of Haestrup and Lisle. Claim 20 recites similar subject matter and is equally not disclosed or suggested.

Thus, there is no suggestion or motivation in the references themselves, or in the knowledge generally available to one of ordinary skill in the art, to modify the references or combine reference teachings and the combination reference(s), which cannot properly be combined, do not teach or suggest all of the claim limitations.

Therefore, a *prima facie* case of obviousness under 35 USC §103(a) is not, and cannot be established.

Claims 2-12, 14-19, 21-35 and 37-39 are also not unpatentable at least by reason of their respective dependencies.

3. Claims 10, 15, 18, 19, 38 and 39 are not unpatentable over Hastrup, Lisle and Barbosa under 35 USC §103(a), at least for the reasons set forth above.

Also, there is no motivation to combine the references, the references are non-analogous art, and the combination does not disclose or suggest each element recited in the claims.

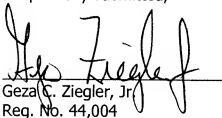
Barbosa is directed to a handheld data management device for conducting field assessments. There is no relationship between Barbosa, using a hand held device for assessment of a field problem, and a predictive text input engine utilizing a dictionary that is keyed by a string of keystrokes or a text compression method where a hierarchy of dictionaries are used to compress and decompress a text. Thus, Barbosa, Hastrup and Lisle are non-analogous art, and there is no motivation to combine these references to achieve Applicant's claimed subject matter.

4. Claim 28 is not unpatentable over Hastrup, Lisle and Adams under 35 USC §103(a), at least for the reasons set forth above.

For all of the foregoing reasons, it is respectfully submitted that all of the claims now present in the application are clearly novel and patentable over the prior art of record, and are in proper form for allowance. Accordingly, favorable reconsideration and allowance is respectfully requested. Should any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

The Commissioner is hereby authorized to charge payment for any fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

Respectfully submitted,



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Date

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